

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN**

WRR ENVIRONMENTAL SERVICES, INC.,

Plaintiff,

v.

ADMIRAL INSURANCE COMPANY,

Defendant.

Case No. 10-C-843

**NOTICE OF MOTION AND MOTION FOR PARTIAL SUMMARY JUDGMENT ON
THE ISSUE WHETHER THE ALLEGED “ABSOLUTE POLLUTION EXCLUSION”
BARS WRR ENVIRONMENTAL SERVICES, INC.’S INSURANCE CLAIM**

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PLEASE TAKE NOTICE that Plaintiff WRR Environmental Services, Inc (“WRR”), by its undersigned counsel, hereby move for partial summary judgment against Defendant Admiral Insurance Company (“Admiral”), seeking a determination that as a matter of law that the “Absolute Pollution Exclusion” allegedly contained in Endorsement 5 to the insurance policy at issue does not bar WRR’s claims.

In support of their motion, WRR submits the accompanying Brief in Support of WRR’s Motion for Partial Summary Judgment On the Issue Whether the Alleged “Absolute Pollution Exclusion” Bars WRR Environmental Services, Inc.’s Insurance Claim, Proposed Findings of Fact, Declaration of Thomas A. Janczewski, and all of the pleadings on file with the Court.

WHEREFORE, WRR respectfully asks the Court for the following relief:

1. An Order in WRR's favor declaring that the alleged "Absolute Pollution Exclusion" does not bar WRR Environmental Services, Inc.'s insurance claim;
2. All other relief the Court deems reasonable and just.

Dated: December 1, 2011

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